

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

September 10, 2021

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees make this submission on behalf of parties that are subject to Section B.2. of the Court's Order at ECF No. 7082 ("Plaintiff Law Firms"). Although the Court's Order at ECF No. 7100 stayed the obligation of such parties to submit declarations to the Court, pending resolution of Oath Inc.'s motion to intervene, those parties have authorized the PECs to submit declarations to voluntarily comply with the Court's Order, notwithstanding the Court's stay Order. Certain additional counsel who are not technically covered by Section B.2 of the Court's August 31, 2021 Order likewise volunteered declarations for the PECs to submit, as well.

The counsel who have voluntarily agreed to submit declarations to comply with ECF No. 7082, Section B.2. are:

Counsel for Personal Injury and Death Plaintiffs

- Dorteia M. Capone for Baumeister & Samuels, P.C.;
- Jeanne M. O'Grady for Speiser Krause, PC; and
- Jack Quinn for the Law Office of John M. Quinn, Esq.

The Honorable Sarah Netburn
September 10, 2021
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Counsel for Commercial Plaintiffs

- Robert C. Sheps for Sheps Law Group, P.C.;
- Ann C. Taylor for Lock Lord LLP;
- Scott S. Katz for Butler Weihmuller Katz Craig LLP;
- Jessica M. Skarin for Butler Weihmuller Katz Craig LLP;
- Catherine B. Altier for Ford Marrin Esposito Witmeyer & Gleser LLP; and
- Patrick Petrocelli for Strook & Strook & Lavan LLP.

The PECs are unaware of any other counsel or firms encompassed within section B.2 of the Court's August 31, 2021 Order.

Respectfully submitted,

COZEN O'CONNOR

By: /s/ Sean P. Carter
SEAN P. CARTER
COZEN O'CONNOR
One Liberty Place
1650 Market Street, Suite 2800
Philadelphia, Pennsylvania 19103
Tel.: (215) 665-2105
Email: scarter@cozen.com
For the Plaintiffs' Exec. Committees

MOTLEY RICE LLC

By: /s/ Robert T. Haefele
ROBERT T. HAEFELE
MOTLEY RICE LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465
Tel.: (843) 216-9184
Email: rhaefele@motleyrice.com
For the Plaintiffs' Exec. Committees

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (SN)

This document relates to:
All Actions

DECLARATION OF DOROTHEA M. CAPONE

I, Dorothea M. Capone, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that:

1. I am an attorney admitted to practice in this Court in the above-captioned matter, a partner at Baumeister & Samuels, P.C. and counsel to Plaintiffs in the above referenced multidistrict litigation proceeding, *In Re: Terrorist Attacks on September 11, 2001*, Civil Action 03 MD 1570 (GBD) (SN) (“September 11th Terrorist Attacks Lawsuit”). I submit this Declaration in response to the Court’s August 12, 2021, Order (ECF No. 7011).

2. In connection with the September 11th Terrorist Attacks Lawsuit, I signed the FBI Protective Order (ECF No. 4255 at 10) and am aware of and have reviewed the Protective Order (ECF No. 1900). For the past nineteen years, I have been one of the primary attorneys at Baumeister & Samuels, P.C. representing the family members of those murdered in the September 11th Terrorist Attacks in this lawsuit against the Kingdom of Saudi Arabia.

3. As part of the September 11th Terrorist Attacks Plaintiffs Lawsuit, I remotely attended the deposition of the Kingdom of Saudi Arabia's former Ministry of Foreign Affairs, Islamic Affairs Division employee Musaed al Jarrah on June 17 and 18, 2021.

4. On June 29, 2021, I obtained a copy of the final transcripts of the Jarrah deposition from a paralegal at Kreindler & Kreindler, LLC. The only individuals from my firm who received emailed copies of the final transcript was my paralegal and myself.

5. At no time did I or my paralegal share the Jarrah deposition transcript with anyone unauthorized to see it under the Protective Order and the FBI Protective Order.

6. At no time did I or my paralegal direct anyone to share the Jarrah deposition transcript with anyone unauthorized to see it under the Protective Order and the FBI Protective Order.

7. Following publication of the Michael Isikoff article, our firm reviewed its handling of the Jarrah deposition transcript after its receipt by the firm, and I am positive that no one from the firm, and no one acting at the direction from anyone at the firm, shared the Jarrah deposition transcript with anyone unauthorized by the Protective Order and the FBI Protective Order.

9. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
September 7, 2021

BAUMEISTER & SAMUELS, P.C.

By: /s/ Dorothea M. Capone
Dorothea M. Capone
140 Broadway, 46th Floor
New York, NY 10005
Tel.: (212) 363-1200
Email: tcapone@baumeisterlaw.com

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>All Cases</i>	

**DECLARATION OF JEANNE M. O'GRADY
IN SUPPORT OF MOTION FOR PARTIAL FINAL JUDGMENTS**

JEANNE M. O'GRADY, Esq., hereby states under penalty of perjury that:

1. I am an attorney admitted to practice before this Court, and am a member of Speiser Krause, PC, representing certain *Ashton* Plaintiffs in the above-captioned multidistrict litigation. I submit this Declaration in response to the Court's Order dated August 30, 2021 (ECF No. 7082).

2. In connection with the In re Terrorist Attacks on September 11, 2001 litigation, I have reviewed and signed the FBI Protective Order (ECF No. 4255) and am aware of and have reviewed the Court's general Protective Order governing discovery in this litigation (ECF No. 1900).

3. As part of the above captioned litigation, I attended the deposition of Musaed al Jarrah via videoconference on June 17-18, 2021.

4. I did not receive a copy of the al Jarrah deposition transcript, nor did I view or share the al Jarrah videoconference with anyone unauthorized to see it under the Protective Orders.

5. At no time did I direct anyone to obtain or to share the al Jarrah deposition transcript or videos with Yahoo! News chief investigative correspondent Michael Isikoff, with anyone acting on his behalf, or anyone else not authorized to receive the deposition under the terms of the Protective Orders.

6. I did not communicate with Michael Isikoff, with anyone acting on his behalf, or

anyone else not authorized to receive the deposition under the terms of the Protective Orders, regarding the contents of the Al Jarrah deposition at any time, including without limitation from June 1, 2021 to present.

7. Following this Court's August 30, 2021, Order, our firm conducted a review of our firm's communications, including personal interviews as well as searches performed by the firm's information technology director of all incoming and outgoing emails. Based on that review, and my personal knowledge, no one with the firm or acting on its direction communicated with Michael Isikoff, with anyone acting on his behalf, or anyone else not authorized to receive the deposition under the terms of the Protective Orders, regarding the contents of the al Jarrah deposition at any time.

8. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: September 8, 2021
Rye Brook, New York

/s/ Jeanne M. O'Grady
JEANNE M. O'GRADY (JO3362)
Speiser Krause, PC
800 Westchester Avenue, Suite S-608
Rye Brook, New York 10573
Tel: (914) 220-5333
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jog@speiserkrause.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11,
2001

03-md-1570
(GBD)(SN)

This document relates to: *All Cases*

DECLARATION OF JOHN M. QUINN A/K/A JACK QUINN, ESQ.

I, John M. Quinn a/k/a Jack Quinn, Esq., declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am the managing attorney at the Law Office of John M. Quinn, Esq. I was Counsel to the President of the United States, William J. Clinton.

2. I have been retained by the *O'Neill* Plaintiffs' counsel in connection with the above-referenced matter.

3. I have been a member of the District of Columbia Bar in good standing since 1976 and have never been subject to disciplinary proceedings by any court. I am admitted *pro hac vice* to this Court and have entered an appearance in the above-referenced matter on behalf of the *O'Neill* Plaintiffs.

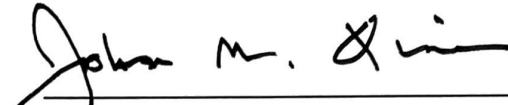
4. I have previously been provided with and have executed all confidentiality and protective orders in the above-referenced case.

5. I have not attended any depositions in the above-referenced case nor have I received any deposition transcripts in this case.

6. From June 1, 2021 through August 1, 2021, I did not speak with or contact Michael Isikoff by any means about anything, including the Mussaed al Jarrah deposition or the Mussaed al Jarrah transcripts.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed in Washington, D.C. on August 31, 2021



John M. Quinn, Esq.

FILED UNDER SEAL – SUBJECT TO MDL PROTECTIVE ORDER

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

:
: Civil Action No. 03 MDL 1570 (GBD) (SN)
: ECF Case
:

This document related to:

All cases

DECLARATION OF ROBERT C. SHEPS

I, Robert C. Sheps, pursuant to 25 U.S.C. § 1746, hereby declare under penalty of perjury that:

1. I am a member attorney with the law firm of Sheps Law Group, P.C. I represent the “Charter Oak” plaintiffs in the above-captioned action, I am a member in good standing of the New York bar since 1996 and have been admitted, and remain in good standing, in the Southern District of New York since 1997.

2. No one employed by or acting at the direction of the Sheps Law Group, P.C. shared the Al Jarrah deposition transcript with Yahoo! News journalist Michael Isikoff, or anyone acting on his behalf, or anyone not authorized to receive the deposition under the terms of the Protective Orders;

3. No one employed by or acting at the direction of the Sheps Law Group, P.C. communicated with Mr. Isikoff or anyone acting on his behalf regarding the contents of the Al Jarrah deposition from June 1, 2021 to August 1, 2021, In fact, we have never communicated with him in any way for any reason to the best of my knowledge.

4. I am confident there is no way that there could have been a breach of the Protective Order leading to someone gaining access and sending the subject transcript to anyone related to the media from my lawfirm. I am the only member in my very small lawfirm actively handling the matter. I have personally asked every employee of the firm and no one else even knew who Al Jarrah or Michael Isikoff even is. I am the only person in my firm who was aware that the deposition of Al Jarrah even took place and participated. No one else in the firm had access to any data base to download the transcript. I did not receive any email with either the rough or final transcript from the court reporter Golkow Litigation Services. Indeed, the al Jarrah transcript was never received or downloaded by anyone in my firm from any database. No other employee would have any idea as how to go about obtaining the transcript even if they wanted to do so. I am quite positive there is no way our firm was involved in any way in the alleged transmission of the Al Jarrah transcript to Mr. Isikoff.

5. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: September 3, 2021

Robert C. Sheps

Robert C. Sheps, Esq.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**In re: TERRORIST ATTACKS ON
September 11, 2001**

:
: **Civil Action No.: 03 MDL 1570 (GBD)(SN)**
: **ECF Case**
:
:

This document relates to: *All cases*

DECLARATION OF ANN C. TAYLOR

I, Ann C. Taylor, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that:

1. I am an attorney admitted to practice *pro hac vice* in the above captioned matter and a partner of the law firm Locke Lord LLP, which is counsel for plaintiffs in the matter styled *Global Aerospace, Inc. v. Kingdom of Saudi Arabia*, 18-cv-5373, consolidated into the above captioned matter.

2. I attended the virtual deposition of Mussaed al Jarrah on June 17-18, 2021. I did not order or receive a daily or interim copy of the deposition transcript.

3. On June 28, 2021, I received an email from Golkow Litigation Services with the final deposition transcript of Mussaed al Jarrah. The following day, I received an email from Golkow Litigation Services with the exhibits from the deposition. While authorized to receive the full deposition transcript and exhibits, Golkow sent the materials in redacted form.

4. It is my recollection that I did not open the transcript of Mussaed al Jarrah until August 11, 2021, when I received a reminder to pay Golkow Litigation Services for the subject deposition services. Following that, I opened the transcript and exchanged email communications with Golkow Litigation Services. On this same day, I was provided the full

transcript and exhibits authorized. It was not until after this transcript was received on August 11, 2021 that I provided copies of the transcripts to an authorized staff member at Locke Lord LLP assisting with this matter. I have not forwarded a copy of either the redacted or full transcript to any other individual. Thus, I am not aware that anyone at Locke Lord LLP had access to the transcripts prior to August 11, 2021, other than me.

5. At Locke Lord LLP, the only persons that have any involvement with this matter are myself, my two law partners T. Patrick Byrnes (admitted *pro hac vice* in this matter), and Joseph Froehlich (a licensed New York attorney that has entered an appearance in this matter), and two authorized Locke Lord staff members who assist us on this matter. Each has confirmed to me that they did not forward a copy of the transcript to anyone.

6. I confirm that Locke Lord LLP has engaged no outside entity or person to act on its behalf or on behalf of its clients in this matter.

7. To further confirm these representations, at my instruction, the IT department of Locke Lord LLP undertook a firm-wide search of all electronic communications sent to an external source between June 1, 2021 and August 2, 2021. The search terms used were as follows: "Terrorist Attacks", "Al Jarrah", "Isikoff", "Mussaed al Jarrah", and "Musaed al Jarrah". The result stated for each was "No results found."

8. In addition, at my instruction, the IT department of Locke Lord LLP undertook a firm-wide search of all electronic communications between June 1, 2021 and August 2, 2021 that were sent to or from the following email addresses: misikoff@oath.com and misikoff@yahoo-inc.com. The result stated for each was "No results found."

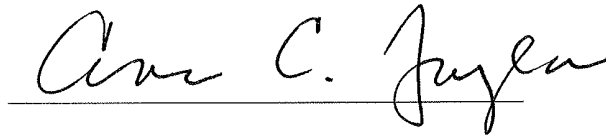
9. I confirm that I have never spoken with Mr. Isikoff or anyone else from Yahoo! News. I confirm I also made this inquiry of T. Patrick Byrnes, Joseph Froehlich, and the two

authorized Locke Lord staff members who assist us on this matter. Each confirmed never having spoken with Mr. Isikoff or Yahoo! News.

10. Following from personal knowledge and the above investigation, I confirm that I am not aware of anyone receiving the deposition that was not authorized to have access to it under the terms of the Protective Orders.

11. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed in Chicago, Illinois on September 8, 2021

A handwritten signature in cursive script, reading "Ann C. Taylor", written over a horizontal line.

Ann C. Taylor

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:

03-MD-1570 (GBD)(SN)
Case No. 1-17-cv-03810
Case No. 1-16-cv-7456

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

**DECLARATION OF
SCOTT S. KATZ**

-----X
I, Scott S. Katz, hereby swear to the following:

1. I am the Managing Partner at Butler Weihmuller Katz Craig LLP and I am admitted to practice *pro hac vice* in the above-caption matter. On behalf of our clients in Case Nos. 1-16-cv-7456 and 1-17-cv-03810, our firm is an active Plaintiff Law Firm in this multi-district litigation. I make this Declaration pursuant to this Court's instructions in its August 30, 2021, Order. I have personal knowledge of and am competent to testify to the facts set forth below.

2. The sole persons at Butler Weihmuller Katz Craig LLP who have worked on this matter include myself, Attorney Jessica Skarin, and Paralegal Elizabeth Berry. Either myself or Attorney Jessica Skarin have attended various depositions in this matter.

3. Specifically, I attended portions of the following depositions: Abdullah al Awad, Saleh bin Abdulaziz al Ash Sheikh, Abdul Aziz Abdul Kareem al Anquari, Abdullah al Jaithen, Mutaib al Sudiary, and Omar al Bayoumi. Attorney Jessica Skarin attended the depositions of Omar al Bayoumi, and Fahad al Thumairy. However, our firm did not attend the Musaed al Jarrah deposition that took place June 17-18, 2021. A review of time entries was performed to confirm which depositions were attended by our firm.

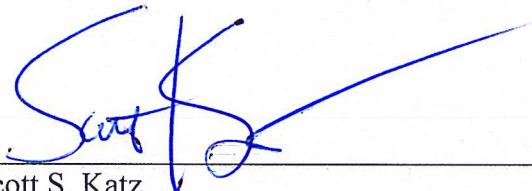
4. I conferred with both Attorney Jessica Skarin and Paralegal Elizabeth Berry to confirm that we did not order the transcript of any deposition in this case and we do not have access

to any of the deposition transcripts in this case. A review of our document management system was performed and no deposition transcripts were found.

5. I have not communicated with Michael Isikoff, or anyone acting on his behalf, regarding any matters relating to this lawsuit. I have not shared a deposition transcript from this lawsuit with Mr. Isikoff, or any other person.

6. Additionally, I conferred with both Attorney Jessica Skarin and Paralegal Elizabeth Berry of our office to confirm that they similarly have had no communications with Michael Isikoff or anyone acting on his behalf.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Tampa, Florida on August 31, 2021.



Scott S. Katz

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In re:

03-MD-1570 (GBD)(SN)
Case No. 1-17-cv-03810
Case No. 1-16-cv-7456

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

**DECLARATION OF
JESSICA M. SKARIN**

-----X


I, Jessica M. Skarin, hereby swear to the following:

1. I am a Partner at Butler Weihmuller Katz Craig LLP and I am admitted to practice *pro hac vice* in the above-caption matter. On behalf of our clients in Case Nos. 1-16-cv-7456 and 1-17-cv-03810, our firm is an active Plaintiff Law Firm in this multi-district litigation. I make this Declaration pursuant to this Court's instructions in its August 30, 2021, Order. I have personal knowledge of and am competent to testify to the facts set forth below.
2. The sole persons at Butler Weihmuller Katz Craig LLP who have worked on this matter include myself, Managing Partner Scott Katz, and Paralegal Elizabeth Berry. Either myself or Scott Katz have attended various depositions in this matter.
3. Specifically, I attended the depositions of Omar al Bayoumi, and Fahad al Thumairy. I did not attend the Musaed al Jarrah deposition that took place June 17-18, 2021, nor did anyone from our firm. I assisted Scott Katz in reviewing the time entries for this matter to confirm which depositions were attended by our firm.
4. I did not order the transcript of any deposition in this case and we do not have access to any of the deposition transcripts in this case. I assisted with a review of our document management system and no deposition transcripts were found.

5. I have not communicated with Michael Isikoff, or anyone acting on his behalf, regarding any matters relating to this lawsuit. I have not shared a deposition transcript from this lawsuit with Mr. Isikoff, or any other person.

6. Additionally, I personally conferred with Paralegal Elizabeth Berry of our office to confirm that she has had no communications with Michael Isikoff or anyone acting on his behalf.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Dallas, Texas on August 31, 2021.



Jessica M. Skarin

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to: *All Cases*

DECLARATION OF CATHERINE B. ALTIER

I, Catherine B. Altier, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that:

1. I am an attorney with the law firm of Ford Marrin Esposito Witmeyer & Gleser, LLP (“Ford Marrin”) and am admitted to practice in this Court. I represent plaintiffs Continental Casualty Company, Transcontinental Insurance Company, Transportation Insurance Company, Valley Forge Insurance Company, National Fire Insurance Company of Hartford, and American Casualty Company of Reading, Pennsylvania in connection with the above-referenced litigation.

2. I attended the virtual deposition of Mussaed Al Jarrah on June 17, 2021 and June 18, 2021. No one else from Ford Marrin attended either day of the Al Jarrah deposition.

3. I have not yet ordered a copy of the transcript from the Al Jarrah deposition, nor did I receive a copy of the rough or final transcript from another source. Therefore, I have not had and do not currently have access to the Al Jarrah transcript.

4. Thus, I did not share the deposition transcript with Michael Isikoff or anyone acting on his behalf, or anyone not authorized to receive the transcript under the terms of the Protective Orders.

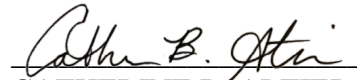
5. Further, I did not direct anyone else to share the deposition transcript with Mr. Isikoff or anyone acting on his behalf, or anyone not authorized to receive the transcript under the terms of the Protective Orders.

6. I did not communicate with Mr. Isikoff or anyone acting on his behalf regarding the contents of the Al Jarrah deposition from June 1, 2021 to August 1, 2021 (or at any other time).

7. Additionally, I did not direct anyone else to communicate with Mr. Isikoff or anyone acting on his behalf regarding the contents of the Al Jarrah deposition from June 1, 2021 to August 1, 2021 (or at any other time).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on September 8, 2021.


CATHERINE B. ALTIER

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:
All Actions

DECLARATION OF PATRICK N. PETROCELLI

I, Patrick N. Petrocelli, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following.

1. I am an attorney admitted to practice in the State of New York and in this Court. I am a Special Counsel at Stroock & Stroock & Lavan LLP (“Stroock”), counsel for Plaintiffs Arrowood Indemnity Company, formerly known as Royal Indemnity Company, and Arrowood Surplus Lines Insurance Company, formerly known as Royal Surplus Lines Insurance Company. I submit this declaration in response to the Court’s Order, entered on August 30, 2021, at ECF No. 7082.

2. In response to the Court’s August 30, 2021 Order, I asked Stroock’s information technology personnel to run searches for all emails sent or received between June 1, 2021, and August 1, 2021, that contained the terms *golkow* or *isikoff*. I make this declaration based upon my own knowledge and knowledge obtained from these searches.

3. On June 16, 2021, I received an email from Golkow Litigation Services that included a link to access the Zoom deposition of Mussaed Al Jarrah (“Al Jarrah”), scheduled for June 17-18, 2021. I was the only recipient from Stroock included on the email, and I did not

forward the email to anyone else. To the best of my knowledge, other than myself, no one employed by or acting at the direction of Stroock had access to the Al Jarrah deposition link.

4. I did not access the link to the Al Jarrah deposition nor did I otherwise attend the Al Jarrah deposition. To the best of my knowledge, no one employed by or acting at the direction of Stroock attended the Al Jarrah deposition.

5. I have not ordered or otherwise received a copy of the transcript from the Al Jarrah deposition. To the best of my knowledge, no one employed by or acting at the direction of Stroock ordered or otherwise received a copy of the transcript from the Al Jarrah deposition.

6. I have never had any communications (written or oral) of any kind with Michael Isikoff or anyone acting on his behalf.

7. To the best of my knowledge, no one employed by or acting at the direction of Stroock shared the Al Jarrah deposition transcript with Isikoff, anyone acting on his behalf, or anyone not authorized to receive the deposition under the terms of the Protective Orders.

8. To the best of my knowledge, no one employed by or acting at the direction of Stroock communicated with Isikoff or anyone acting on his behalf regarding the contents of the Al Jarrah deposition from June 1, 2021, to August 1, 2021.

9. I also asked Stroock's information technology personnel to run searches for all emails sent to or by misikoff@yahoo-inc.com or misikoff@oath.com between June 1, 2021, and August 1, 2021. That search did not return any results.

10. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: September 9, 2021


Patrick N. Petrocelli